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FARUQI & FARUQI

October 3, 2023

VIA ECF

The Honorable Colleen McMahon United States District Court Southern District of New York 500 Pearl Street, Room 2550 New York, NY 10007

NEW YORK CALIFORNIA GEORGIA PENNSYLVANIA Murphy v. Argo Blockchain plc, No. 23 Civ. 7305 (CM)

Dear Judge McMahon:

Re:

My firm is Lead Counsel for the putative class in this securities Action. We submit this letter request on behalf of Lead Plaintiff (Richard Hawes) and Defendants Argo Blockchain plc ("Argo"), Peter Wall, Alex Appleton, Matthew Shaw, Sarah Gow, Colleen Sullivan and Maria Perrella (collectively, the "Defendants") to respectfully request that the Court adjourn the deadline to file a civil case management plan ("CMP"), currently due on Friday, October 6, 2023, and all other pre-trial proceedings. See Order Scheduling an Initial Pretrial Conference, ECF No. 43. This is the first request being made to adjourn the filing of a CMP and other pretrial proceedings. Further, the requested adjournments do not affect any other scheduled dates. Defendants consent to these requested adjournments.

This Action, which is governed by the Private Securities Litigation Reform Act of 1995 ("PSLRA"), was originally commenced in the Eastern District of New York. After the appointment of Lead Plaintiff and Lead Counsel, the Action was transferred to this Court. ECF 3 No. 39 and Docket Entries dated Aug. 4, 2023 and Aug. 8, 2023. Shortly after the transfer, this Court approved the Parties' proposed schedule for the filing of Lead Plaintiff's amended complaint and briefing schedule for Defendants' Motion to Dismiss. ECF No. 42. Pursuant to this schedule, Lead Plaintiff has filed his amended complaint and Defendants' motion to dismiss will be fully briefed by February 7, 2024.

The Parties respectfully suggest that under these circumstances, where the PSLRA automatically stays all discovery and other proceedings during the pendency of a motion to dismiss, that the adjournment of the filing of a CMP and other pre-trial proceedings is appropriate until the Court rules on Defendants' motion to dismiss.

Respectfully submitted,

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Attorneys for Lead Plaintiff Richard Hawes and Lead Counsel for the putative Class

cc: Joel Haims, counsel for defendants